

STEVEN F. GRUEL (CSBN 213148)
Attorney at Law

315 Montgomery Street, 9th Floor
San Francisco, California 94122
Telephone Number (415) 989-1253
Fax Number (415) 449-3622
attystevengruel@sbcglobal.net

Attorney for Juan Alfredo Bermudez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR-05-00118-MMC
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER CONTINUING COURT HEARING
Vs.)	
)	Honorable Maxine M. Chesney
JUAN ALFREDO BERMUDEZ and)	
)	
JOSE JAIME CARDENAS,)	Excl. Time: 18 USC 3161(h)(8)(A)
)	
Defendants.)	
)	
)	
)	

Defendants Juan Alfred Bermudez and Jose Jaime Cardenas by and through their respective attorneys, Steven F. Gruel and Claire Leary, and the United States of America, by and through its attorney, C. David Hall, Assistant United States Attorney, hereby stipulates and requests that the hearing date currently scheduled for May 27, 2009 at 2:30p.m. be continued to October 28, 2009 at 2:30 p.m.

The parties stipulate that good cause and excludable time under the Speedy Trial Act justify and permit the continuance to October 28, 2009. Specifically, the parties are still discussing a

STIPULATION AND [PROPOSED] ORDER CONTINUING COURT

1 resolution in this case which also entails discussions pertaining to the immigration consequences
2 for each defendant.

3 Furthermore, defendant Juan Alfredo Bermudez has recently undergone serious surgery
4 requiring further treatment resulting in making him medically unavailable to attend the May 27,
5 2009 hearing.
6

7 SO STIPULATED:

8 DATED: 5/19/09

9 /s/
STEVEN F. GRUEL
Attorney for Juan Alfredo Bermudez

10
11 DATED: 5/19/09

12 /s/
CLAIRE LEARY
Attorney for Jose Jaime Cardenas

13
14 DATED: 5/19/09

15 /s/
DAVID HALL
Assistant United States Attorney

16
17
18 ~~PROPOSED~~ ORDER

19 PREDICATED on the above stipulation and GOOD CAUSE APPEARING,
20 the hearing date of May 27, 2009 is hereby continued to October 28, 2009 at 2:30 p.m.

21 FURTHER, as stipulated by the parties, the Court finds that the time from May 27, 2009
22 to October 28, 2009 shall and hereby does constitute excludable time under the Speedy Trial Act
23 in accordance with 18 USC ~~3161(h)(8)(A)~~. 3161(h)(7)(A).

24 IT IS SO ORDERED.

25 Dated: May 22, 2009

26 
HONORABLE MAXINE M. CHENEY
United States District Court

STIPULATION AND [PROPOSED] ORDER CONTINUING COURT